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26 October 1992

Ms. Christina Purcell, Case Manager
New Jersey Department of Environmental Protection and Energy
Division of Hazardous Waste Management
Bureau of Federal Case Management
CN 028
Trenton, New Jersey 08625-0028

W.O. No.: 06720-009-001-0001

RE: L.E. CARPENTER FINAL FEASIBILITY STUDY (FS) REPORT
RESPONSE TO USEPA'S COMMENTS RELAYED
IN LETTER DATED 22 SEPTEMBER 1992

Dear Ms. Purcell:

On behalf of our client, L.E. Carpenter, Roy F. Weston, Inc. (WESTON®) is pleased to present this letter which will outline the responses to each of EPA's comments provided through you in your letter dated 22 September 1992, regarding the final FS.

1. L.E. Carpenter and WESTON agree to defer any potential future Cultural Resource Survey (CRS) work if needed until the Record of Decision (ROD) is signed.

2. WESTON understands that, pursuant to our telephone conversation of 15 October 1992, the floodplain delineation is a resolved ARAR.

3. WESTON agrees that the Farmland Protection Policy Act is a resolved ARAR and no action is required.

4. The five subparts of this comment specify several ARARs that EPA requests to be included in the FS report. The regulations specified were inferred in the earlier version of the report. WESTON will explicitly cite these regulations and guidance documents in the final FS. Comment 6d refers to OSWER Directive 9234.1-06. WESTON's interpretation of this directive indicates that, provided that remedial goals are met at the conclusion of a remedial action, reinjection of treated groundwater exceeding those goals is permissible. In addition, consistent with previous agreements between L.E. Carpenter and the Department, L.E. Carpenter intends to comply with NJDEPE's proposed cleanup standards at the completion of remediation.

5. The air emissions ARARs attached to your letter were included in a previous letter (dated 26 April 1991) from NJDEPE, and were incorporated in the July 1992 FS report.

6(a). WESTON does not agree with the need to resample or install additional deep groundwater wells. Regarding the presence of DEHP in MW-11D, there is considerable question as to the exact meaning of the following statement:

> "This may represent a migrating contamination in MW-11D, and this may represent a migrating bedrock plume since this well is down gradient to the shallow zone plume." Consequently, USEPA advises that a contingency be included should future sampling result in detections of contaminants in the bedrock wells.

Firstly, there are no bedrock wells at the L.E. Carpenter site. All of the deep aquifer zone wells are screened in the unconsolidated materials directly above the bedrock. Secondly, the screened interval for MW-11D is not located downgradient to the shallow zone plume. Table 3-3 of the "Final Supplemental Remedial Investigation Addendum for L.E. Carpenter and Company," WESTON 1992 (p. 3-21) shows that the hydraulic gradients at the MW-11 well cluster are oriented upward. Therefore, in the vertical plane, the screened interval for MW-11D is upgradient of the shallow aquifer zone plume.

Thirdly, it is not likely that a single detection of DEHP represents a migrating bedrock plume originating from the L.E. Carpenter site. We call your attention to the fact that the specific gravity of DEHP is less than that of water. In order for the DEHP in MW-11D to have originated at the L.E. Carpenter site, it would have had to sink through a denser liquid (water), as well as flow against the hydraulic gradient. Furthermore, if the DEHP detected in MW-11D did originate from the L.E. Carpenter site, residual concentrations of DEHP would be detected in the intermediate depth well in the cluster. DEHP was not detected in MW-11I in either round of sampling. Since these data do not indicate that a deep DEHP plume exists at the site, additional intermediate depth wells between the MW-11 and MW-14 well clusters are both unnecessary and excessive.

Lastly, language presented in the Departments proposed cleanup goals allows technical judgments to be made based upon the absence of confirmatory sampling (i.e. a single, isolated "hit" in one round of sampling, one well, etc.).

6(b). (6.2.1.1 is actually "Description of (No Action) Alternative" and is found on page 6-5). WESTON proposed volatile organic compounds by EPA Method 602 as a cost effective means of tracking a contaminant plume. Volatile organics are much more mobile than phthalate compounds, and therefore may be used as indicators of the forward edge of a mixed volatile and semi-volatile contaminant plume. Further, it is expected that volatile

organics will be removed/destroyed during remediation at a faster rate than semi-volatile organics. Therefore, WESTON continues to support the proposal to monitor for volatile organics during the beginning phases of the remedial action, and increasing the analytical parameters to include semi-volatiles as remediation progresses and volatile organic contaminant concentrations are reduced, indicating success in the groundwater remediation.

6(c). The requested wording changes will be incorporated in the revised report.

If you should have any questions, please do not hesitate to call me at (908) 225-3990.

Very truly yours,

ROY F. WESTON, INC.

Martin J. O'Neill, CHMM
Senior Project Manager

cc: C. Anderson
R. Hahn

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DATE: 10/4/92 NUMBER OF PAGES: 4 (Incl. cover)

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COMMENTS: FYI - pls comment back if necessary - will follow by hard copy - Thx CP